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November 10, 2023

Via ECF and Email: shl.orders@nysb.uscourts.gov

Honorable Sean H. Lane
United States Bankruptcy Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

**RE: In re Jaana Colangelo, Chapter 7 Debtor
SDNY Case No. 23-22355 (SHL)**

Dear Honorable Judge Lane:

This firm represents Business Finland, Inc. (“Business Finland”), a scheduled creditor in the above referenced case. We write in regard to the Court’s Order dated August 22, 2023 authorizing the production of documents and examinations pursuant to Fed. R. Bankr. P. 2004 (the “Order”). [ECF No. 21]. Pursuant to the Order, Business Finland served document subpoenas on Jaana Colangelo (the “Debtor”), Ronald Colangelo (the “Husband”), and Blacklabrador.com, Inc. (“Black Labrador”) on August 30, 2023.

Further to the Order, the Debtor, Husband and Black Labrador were ordered to produce documents on September 20, 2023. *See*, Order at ¶ 4. To date, Business Finland has not received any documents or any response at all to the subpoenas from Husband or Black Labrador. Further, the Debtor has only provided partial responses to the subpoena. The documents Business Finland has requested from the Husband and Black Labrador are particularly relevant in light of their involvement in the diversion of funds from Business Finland and possible concealment of assets that may be belong to the Debtor’s estate and Business Finland. Thus, Business Finland requests leave to file a motion to compel the Debtor, Husband and Black Labrador to comply with the subpoenas with a hearing date of December 13, 2023 at 10:00 a.m. *See, In re Parikh*, 397 B.R. 518, 526-27 (E.D.N.Y. 2008) (granting a motion to compel compliance with a Rule 2004 subpoena for the production of documents and an examination, awarding attorneys’ fees in connection with bringing the motion and requiring \$100.00 to be paid per day until compliance).

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Should you have any questions, please do not hesitate to have your Honor's Chambers contact the undersigned. Business Finland thanks the Court for its time and assistance in this matter.

Respectfully submitted,

/s/ Julie Cvek Curley
Julie Cvek Curley

JCC/

cc: Todd Cushner, Esq. (*Via Email*)
Jaana Colangelo (*Via Federal Express*)
Ronald Colangelo (*Via Federal Express*)
Blacklabrador.com, Inc. (*Via Federal Express*)